

## **EXHIBIT D**

### **Proposed Non-Party Deponents**

- Two individuals with clinical and/or administrative oversight of the practitioners treating injuries that inmates suffer in use of force incidents:
  - Deputy Commissioner of Health Affairs Erik Berliner (Category 2)
  - New York City Department of Health and Mental Hygiene Medical Director Homer Venters (Category 2)
- Four individuals in the Investigation Division that are charged with different parts of the investigation process, as described in Florence Finkle's July 2, 2013 deposition:
  - Assistant Commissioner of the Investigation Division Sabina Blaskovic (Category 5 and 7)
  - Investigation Division Supervisor Janet Gooding (Category 5)
  - Investigation Division Deputy Director Sean Cussen (Category 5)
  - Investigation Division Deputy Director Ruben Benitez (Category 5)
- Three individuals that are or were high ranking officials in the DOC responsible for DOC's policies and practices related to use of force:
  - First Deputy Commissioner Mark Cranston (Category 5 and 7)
  - Special Operations Division Warden Brian Suprenant (Category 5 and 7)
  - former First Deputy Commissioner Lewis Finkleman (Category 5 and 7)
- Deputy Mayor Linda Gibbs has oversight of the Department of Correction (Category 5 and 7).
- Deputy Executive Director of the Board of Corrections ("BOC") Amanda Masters directs the BOC, which has responsibility for the jails, and investigates and drafts reports regarding use of force incidents in the City jails (Category 6).